

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

GEORGIA STATE CONFERENCE OF THE NAACP;
GEORGIA COALITION FOR THE PEOPLE'S
AGENDA, INC.; GALEO LATINO COMMUNITY
DEVELOPMENT FUND, INC.,

Plaintiffs,

v.

STATE OF GEORGIA; BRIAN KEMP, in his official
capacity as the Governor of the State of Georgia;
BRAD RAFFENSPERGER, in his official capacity as
the Secretary of State of Georgia,

Defendants.

Case No. 21-cv-5338

COMMON CAUSE; LEAGUE OF WOMEN
VOTERS OF GEORGIA; DR. URSULA THOMAS;
JASMINE BOWLES; DR. H. BENJAMIN
WILLIAMS,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his official capacity as
Secretary of State of Georgia,

Defendant.

Case No. 22-cv-00090

STIPULATION AND ORDER REGARDING DISCOVERY

The undersigned Parties have entered into this Stipulation and Order to govern discovery obligations in this action.

I. GENERAL PROVISIONS

- A. The Parties, which includes the Plaintiffs and Defendants, as well as their officers, directors, employees, and agents are referred to as the “Parties” solely for purposes of this stipulation.
- B. “Plaintiff” or “Plaintiffs” as used here shall mean the parties listed in Appendix A.
- C. “Defendant” or “Defendants” as used here shall mean the parties listed in Appendix B.
- D. “Third Party” or “Third Parties” as used here shall mean any party listed in Appendix C, and also any party that Plaintiffs or Defendants issue a subpoena or subpoenas to in relation to this action.

II. Fact Depositions

- A. Except for those depositions governed by section II.C. of this stipulation, the Parties agree to hold fact depositions for Plaintiffs or Defendants by December 16, 2022.
- B. The Parties agree to hold fact depositions for Third Parties by December 16, 2022.
- C. The Parties agree to hold fact depositions for persons associated with the Office of the Georgia Secretary of State by January 10, 2023.
- D. The Parties agree that depositions may occur after December 16, 2022, if:
 - i. they are based on information newly provided in documents produced or in depositions, by the Defendants, Third Parties, or Plaintiffs,
 - ii. and a deposition subpoena is issued within four weeks of that information provided.
- E. For the avoidance of doubt, the Parties agree that continuations of depositions may occur after these deadlines.

III. Fact Document and Written Discovery

- A. The Parties agree that Defendants shall begin the production of documents in response to the existing requests by no later than September 13, 2022.

- B. The Parties agree that Defendants shall produce documents every two weeks such that the production is complete—including privilege logs, to the extent necessary—by October 20, 2022.
- C. The Parties agree that the deadline to issue discovery requests is October 23, 2022.
- D. However, the Parties agree that discovery requests may be issued based on information newly provided in documents produced or in depositions, by the Plaintiffs, Defendants, or Third Parties, within four weeks of that information provided.
- E. For the avoidance of doubt, the Parties agree that they may still confer regarding *existing* document and written discovery requests after these deadlines, but no new requests may be issued.

IV. Meet and Confer

- A. The parties agree that they will continue to meet and confer to adjust these deadlines if needed to ensure fact and expert discovery closes by February 17, 2023.

Agreed to by counsel for the Parties:

For the Georgia State Conference of the NAACP, et al. Plaintiffs:

/s/ Toni Michelle Jackson, 9/14/2022

For the Common Cause Plaintiffs:

/s/ Jack Genberg, 9/14/2022

For Defendants:

/s/ Bryan Tyson, 9/14/2022

Appendix A

The Plaintiffs in this action are:

Georgia State Conference of the NAACP

Georgia Coalition for the People's Agenda, Inc

GALEO Latino Community Development

Common Cause

League of Women Voters of Georgia

Dr. Ursula Thomas

Jasmine Bowles

Dr. H. Benjamin Williams

Brianne Perkins

Dr. Cheryl Graves

Appendix B

The Defendants in this action are:

The State of Georgia

Governor Brian Kemp

Secretary Brad Raffensperger

Appendix C

The Third Parties in this action are:

Legislative and Congressional Reapportionment Office

Senate Redistricting & Reapportionment Committee

House Legislative and Congressional Reapportionment Committee

Rep. Bonnie Rich

Sen. John Kennedy

Gina Wright